

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF WISCONSIN**

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Joint Application of Wisconsin Power and Light  
Company and Wisconsin Electric Power Company  
For Certificate of Authority for Edgewater Generating  
Station Unit 5 NOx Reduction Project

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Docket No. 05-CE-137

**CUB AND CLEAN WISCONSIN'S  
QUESTIONS TO WISCONSIN ELECTRIC POWER COMPANY  
AND WISCONSIN POWER AND LIGHT COMPANY  
PURSUANT TO THE COMMISSION'S NOTICE OF TECHNICAL CONFERENCE**

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To: Kate Phillips  
[Catherine.Phillips@we-energies.com](mailto:Catherine.Phillips@we-energies.com)

Michael Greiveldinger  
[MichaelGreiveldinger@alliantenergy.com](mailto:MichaelGreiveldinger@alliantenergy.com)

PLEASE TAKE NOTICE that the Citizens Utility Board of Wisconsin ("CUB") and Clean Wisconsin ("CW") request Wisconsin Electric Power Company ("WEPCO") and Wisconsin Power and Light Company ("WPL") to be prepared to discuss these questions at the Technical Conference pursuant to the Commission's Notice mailed March 27, 2009. I am authorized to state that Sierra Club has reviewed the public versions of these questions and concurs that they should be addressed at the Technical Conference.

## **JOINT QUESTIONS**

CUB and CW's review of the EGEAS analyses submitted by both companies reveals significant differences in certain assumptions used by the companies. The attached confidential graphs in Exhibit A<sup>1</sup> show some of these differences. CUB and CW believe that the companies should have more consistent assumptions for certain variables, and that certain assumptions should be modeled with a base assumption, a low assumption, and a high assumption as shown below. At the Technical Conference CUB and CW request that the companies explain the differences between them for each of the following assumptions:

1. Edgewater 5 characteristics (both with and without the SCR)
  - a. MW rating
  - b. EFOR
  - c. Heat Rate
  - d. Fixed and variable O&M
2. Natural Gas Price forecasts – base, high, and low
3. Current coal prices current and coal price forecasts – base, high, and low
4. Edgewater 5 SCR capital costs (inc. carrying costs) – base, high, and low
5. Emission allowances prices and start date – base, high, and low
  - a. CO2
  - b. SO2
  - c. NOX
6. Method of emission allowance modeling
7. Generation options or planning alternatives in EGEAS
8. Load growth – base, high, and low

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<sup>1</sup> The graphs are based on confidential information provided by the Companies. The confidential exhibit referenced in this submission is expected to be provided to both WEPCO and WPL upon confirmation from each party's attorney. Copies of the confidential exhibit will be provided to Commission staff at the Technical Conference to be held April 16, 2009.